

1 JEROME C. ROTH (State Bar No. 184950)
Jerome.roth@mto.com

2 HOJOON HWANG (State Bar No. 184950)
Hojoon.hwang@mto.com

3 MIRIAM KIM (State Bar No. 184950)
Miriam.kim@mto.com

4 MUNGER, TOLLES & OLSON LLP
560 Mission Street
5 Twenty-Seventh Floor
San Francisco, California 94105-2907
6 Telephone: (415) 512-4000
7 Facsimile: (415) 512-4077

8 WILLIAM D. TEMKO (State Bar No. 98858)
William.temko@mto.com

9 MUNGER, TOLLES & OLSON LLP
355 S. Grand Avenue

10 Thirty-Fifth Floor
Los Angeles, California 90071-1560

11 Telephone: (213) 683-9100
Facsimile: (213) 687-3702

12 *Attorneys for Defendants LG Electronics, Inc.,*
13 *LG Electronics U.S.A., Inc., LG Electronics*
Taiwan Taipei Co., LTD

14 UNITED STATES DISTRICT COURT
15
16 NORTHERN DISTRICT OF CALIFORNIA
17
18 SAN FRANCISCO DIVISION

19 IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC

MDL No. 1917

20 This Document Related to:
21
22 DIRECT PURCHASER ACTIONS

**DECLARATION OF JESSICA
BARCLAY-STROBEL IN SUPPORT OF
DEFENDANTS LG ELECTRONICS, INC.
AND LG ELECTRONICS U.S.A.'S
SECOND ADMINISTRATIVE MOTION
TO SEAL IN SUPPORT OF MOTIONS
FOR PARTIAL SUMMARY JUDGMENT**

[Administrative Motion to Seal and [Proposed]
Order filed concurrently herewith]

26 Judge: Hon. Samuel Conti
27 Date: February 6, 2015
Time: 10:00 a.m.
28 Crtrm.: 1, 17th Floor

1 I, Jessica Barclay-Strobel, declare:

2 1. I am an attorney with the law firm Munger, Tolles & Olson LLP, counsel of record
3 for Defendants LG Electronics, Inc., LG Electronics U.S.A., Inc., and LG Electronics Taiwan
4 Taipei Co., Ltd. (collectively, "LGE") in the above entitled action. I am licensed in the State of
5 California and admitted to practice before this Court. I make this declaration based on my
6 personal knowledge and, if called upon as a witness, could and would testify competently as to the
7 matters set forth below.

8 2. Pursuant to Civil Local Rule 7-11 and 79-5, I make this declaration in support of
9 LGE Defendants' Administrative Motion to Seal.

10 3. Defendants seek permission to file under seal the highlighted portions of the sealed
11 version of:

12 (a) Defendant LG Electronics, Inc.'s Notice of Motion and Motion for Partial
13 Summary Judgment on Withdrawal Grounds and Memorandum of Points and Authorities in
14 Support Thereof;

15 (b) LGE Defendants' Notice of Motion and Motion for Partial Summary
16 Judgment on FTAIA Grounds and Memorandum of Points and Authorities in Support Thereof;

17 (c) LGE Defendants' Notice of Motion and Motion for Partial Summary
18 Judgment on Standing Grounds and Memorandum of Points and Authorities in Support Thereof.

19 4. The portions the documents referenced in Paragraph 3 contain discussion, analysis,
20 references to, or information taken directly from, material designated by another party in this
21 matter as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL" under the Stipulated Protective
22 Order (Dkt. No. 306) in this case.

23 5. Defendants further seek permission to file under seal the following documents in
24 their entirety:

25 (a) Exhibits 8, 10, 11, 13, 25, and 26 in the Declaration of Cathleen H. Hartge
26 in Support of Defendant LG Electronics, Inc.'s Notice of Motion for Partial Summary Judgment
27 on Withdrawal Grounds and Memorandum of Points and Authorities in Support Thereof ("Hartge
28 Declaration");

1 (b) Exhibits 15, 16, 17, 18, 20, 21, and 22 in the Hartge Declaration;

2 (c) Exhibits 2, 3, 4, 5, 7, and 9 in the Declaration of Hojoon Hwang in Support
3 of LGE Defendants' Notice of Motion and Motion for Partial Summary Judgment on FTAIA
4 Grounds and Memorandum of Points and Authorities in Support Thereof ("Hwang Declaration");

5 (d) Exhibits 1, 6, and 8 in the Hwang Declaration;

6 6. The documents referenced in paragraph 5(a) were produced by Defendants Philips
7 and Hitachi in this litigation and have been designated "CONFIDENTIAL" or "HIGHLY
8 CONFIDENTIAL" under the Stipulated Protective Order (Dkt. No. 306).

9 7. The documents referenced in paragraph 5(b) are excerpts of the transcripts of
10 depositions of various Chunghwa, Samsung, Panasonic, Hitachi, and Philips witnesses. These
11 excerpts were designated "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL" pursuant to the
12 Stipulated Protective Order (Dkt. No. 306).

13 8. The documents referenced in paragraph 5(c) were produced by Direct Action
14 Plaintiffs in this litigation and have been designated "CONFIDENTIAL" or "HIGHLY
15 CONFIDENTIAL" under the Stipulated Protective Order (Dkt. No. 306).

16 9. The documents referenced in paragraph 5(d) are excerpts of the transcripts of
17 depositions of various Direct Action Plaintiffs witnesses. These excerpts were designated
18 "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL" pursuant to the Stipulated Protective Order
19 (Dkt. No. 306).

20 10. LGE seeks to submit the above material under seal in good faith in order to comply
21 with the Stipulated Protective Order in this action and the applicable Local Rules. Because the
22 information LGE seeks to submit under seal has been designated as Confidential or Highly
23 Confidential by other parties, LGE is filing the accompanying Administrative Motion, and will be
24 prepared to file an unredacted versions of the above-referenced documents in the public record if
25 required by Civil Local Rule 79-5(e).

26 I declare under penalty of perjury under the laws of the United States that the foregoing is
27 true and correct.

28 Executed on November 7, 2014, in Los Angeles, California.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

/s/ Jessica Barclay-Strobel
JESSICA BARCLAY-STROBEL